

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

GEORGE SMITH

#2:25-CV-10056-RJW-EAS

Plaintiff

Vs

**WOODY'S USED GRAIN BINS INC.
A Michigan Corporation
KRISTOPHER WOLFE, ANTHONY
WOLFE, and WOLFE BROTHERS
FARMS, a Pennsylvania partnership**

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CROSS CLAIM AGAINST CO-DEFENDANT

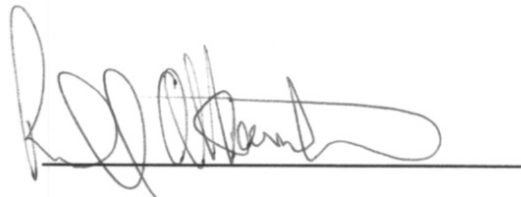
NOW COMES C0-Defendant Woody's Used Grain Bins, Inc. a Michigan Corporation, by its Attorney Richard A Hamilton, and for its' Cross Claim against Co-Defendants Kristopher Wold, Anthony Wolf, and Wolf Brothers Farms, respectfully respects to the Court as follows:

1. Woody's Used Grain Bins, Inc, is a Michigan Corporation whose registered office is Flushing, Michigan, Co-Defendants Kristopher Wolf and Anthony Wolf and residents of the State of Pennsylvania and Wolf Brothers Farms is a Partnership with its' principle place of business in Pennsylvania.
2. This Court has jurisdiction over this action based upon diversity of citizenship and is presently pending in the Eastern District Court for the State of Michigan , southern division as case # 2:25-CV-10056-RJW-EAS.
3. Woody's Used Grain Bins, Inc sells Grain Bins and Equipment related thereto in multiple states and in the course of said business sold certain grain bins to the Co-Defendants in the late summer of 2023.
4. Co-Defendants Kristopher Wolf and Anthony Wolf and Wolf Brothers Farms after payment for the grain bins purchased, arrived at the site of the bins in the State of Minnesota and proceeded to load said bins onto the trucks dispatched for delivery to their location.
5. In addition to the grain bins and equipment purchased, the Co-Defendants loaded and removed an additional bin belonging to Woody's Used Grain Bins, Inc.
6. Co-Defendants were confronted by a representative of Woody's Used Grain Bins, Inc while loading the bins and were told that they had not purchased the extra bin owned by Woody's, but refused to unload the bin and leave it in place.

7. The local police were contacted and arrived on site but refused to take action on the basis that it involved a civil dispute.
8. The Co-Defendants removed the bin belonging to Woody's and transported the bin to Pennsylvania and have refused to return the bin or pay Woody's for the cost thereof.
9. The value of the grain bin was \$68,500.00.
10. The Minnesota Statute 604.14 provides that a person who converts the property of another provides for punitive damages in the amount of 50% to 100% of the value of the converted property in addition to the value of the converted property.

WHEREFORE, Woody's Used Grain Bins Inc. respectfully requests this Court

- A. Enter a judgment against Co-Defendants Kristopher Wolfe, Anthony Wolfe and Wolfe Brothers Farms in the amount of \$137,000. Plus interest, costs and Attorney Fees in this behalf sustained, and
- B. That Co-Defendant Woody's Used Grain Bins, Inc. be awarded such other and further relief as it just and proper.



Richard A Hamilton (P 14574)

Dated 5/22/25